

# EXHIBIT C

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

KIMBERLY WROBLEWSKI,

Plaintiff,

v.

CASE NUMBER: 24-cv-10011  
HON: MARK A. GOLDSMITH

CITY OF DETROIT, COUNTY OF WAYNE,  
JAMES DIGUISEPPE, NICHOLAS GIAQUINTO,  
BRIAN RINEHART, and DENNIS DOHERTY,  
in their individual and official capacities,

Defendants.

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**PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT**  
**COUNTY OF WAYNE**

**PLEASE TAKE NOTICE** that the following Interrogatories are directed to Defendants under the provisions of Federal Rules of Civil Procedure and the various subdivisions thereof, and you are required to answer said Interrogatories with all the information as is available to you. The information to you shall include all information relevant to Federal Rules of Civil Procedure, which is in the possession or knowledge of your agents, employees, attorneys, investigators, or the agents of the same.

You are required to file answers to these Interrogatories under oath within Thirty (30) days after service of them upon you. A copy of your answers is to be served upon counsel for the Plaintiff, which said answers should be signed by you under oath.

**INTERROGATORY INSTRUCTIONS**

1. "Document" means any handwritten, typewritten, recorded, or graphic matter however produced or reproduced, whether or not in the possession, custody, or control of the defendants, and whether or not claimed to be privileged against discovery or any ground, including but not limited to: all contracts, reports, books, records, lists, memoranda, correspondence, telegrams, telexes, appointment calendars, diaries, schedules, films, videos, photographs, sound recordings, signed or unsigned documents, any and all prison/jail records, as well

as sent or unsent drafts of documents. "Document" shall also mean and include the original and every copy regardless of origin or location.

2. "Identify" when used in reference to an individual means to state that person's full name, present address, present or last known position and business affiliation.
3. When used in reference to persons or members of a class, the term, "identify" means to identify each individual member or members of such class.
4. "Identify", "identification", or "describe" when used in reference to documents means to state the following as to each such document: (a) the title, if any, and the nature and contents thereof; (b) the date; (c) the date the document was executed if different from the date it bears; (d) the name, address, and position of the addressee, if any; (e) the present location and the name, present address, and position of the person having present custody; and (g) whether the document has been destroyed, and if so, with regard to such destruction, the date, the reason, and the identity of the person or persons who destroyed the document.
5. The above information shall be given in sufficient detail to enable a party or person to whom a subpoena or Request for Production is directed to fully identify the documents sought to be produced and to enable counsel for the Plaintiff to determine that such document, when produced, is, in fact, the document so described.

6. When used in these Interrogatories, the terms “you” and “your(s)” includes the Defendant as well as the Defendant’s agents, servants, employees, partners, representatives, experts and consultants, and unless privileged, the attorneys.
7. “Date” means the exact date, month and year, if ascertainable, if not, your best approximation, which may include relationships to other events.
8. If any information is withheld under a claim of privilege or other exclusion from discovery, state the nature of the information or document withheld, the privilege or other exclusion that is claimed, and the facts upon which the claim of privilege or exclusion is based.
9. The singulars shall be deemed to include the plural and vice-versa and the words “and” and “or” shall be construed either conjunctively or disjunctively, in the manner which affords the broadest scope to the Interrogatories.
10. Do not respond to any Interrogatory merely by stating, “see attached.” Specifically identify the particular documents that are responsive to each Interrogatory.
11. For the convenience of the Court and the parties, please restate each Interrogatory to your written response prior to your written identification of the produced documents.
12. The word, “person” means any natural person, firm or corporation, partnership, joint venture, or any other form of business entity.

### **INTERROGATORIES**

1. Please state the name, address, and job title or capacity of the person(s) answering these Interrogatories, in addition to all those who assisted in their preparation.

**ANSWER:**

2. As a result of the incidents complained of, did Defendant Rinehart or Defendant Doherty receive any disciplines or negative employment actions? If your answer is in the affirmative, please provide the following information:

- (a) The nature of the disciplines or negative employment actions;
- (b) The names and contact information of those involved in issuing the disciplines and/or negative employment actions; and
- (c) when the disciplines and/or negative employment actions were issued.

**ANSWER:**

3. Did the County of Wayne or the Wayne County Prosecutor's Office conduct any sort of Internal Affairs, Garrity, or other type of investigation regarding the incidents complained of? If your answer is in the affirmative, please state the following:

- (a) The names and contact information of those who conducted or were involved in the investigations;
- (b) The reasons why the investigations were launched;

- (c) When the investigations occurred;
- (d) The outcome of the investigations; and
- (e) Whether there was any appeals done regarding the investigation results.

**ANSWER:**

4. Were any Garrity interviews conducted with respect to the incidents complained of? If your answer is in the affirmative, please provide the following:

- (a) The names and contact information of those who gave Garrity statements;
- (b) The names and contact information of those involved in the Garrity process;
- (c) Any resulting actions taken as a result of the Garrity interviews;
- (d) *Please provide copies of all Garrity documents and interviews.*

**ANSWER:**

5. With respect to the incidents complained of, were any recorded statements taken, other than for Garrity? If your answer is in the affirmative, please also provide the following:

- (a) The names and contact information of those who gave such statements;
- (b) The names and contact information of those involved in the obtaining of such statements;
- (c) Any resulting actions taken as a result of the statements;

(d) *Please provide copies of all such statements and related documents.*

**ANSWER:**

6. Has the Michigan Attorney General's Office been involved in any sort of investigation regarding the incidents complained of? If your answer is in the affirmative, please provide the following information:

- (a) Your understanding of why they became involved;
- (b) When the investigation began and when it closed;
- (c) The names and contact information of all of those involved in the investigation; and
- (d) The results of the investigation.

**ANSWER:**

7. Has the Washtenaw County Prosecutor's Office been involved in any sort of investigation regarding the incidents complained of? If your answer is in the affirmative, please provide the following information:

- (a) Your understanding of why they became involved;
- (b) When the investigation began and when it closed;
- (c) The names and contact information of all of those involved in the investigation; and
- (d) The results of the investigation.



**ANSWER:**

8. Please provide the names and contact information of all Wayne County Sheriff's Department command staff who are aware of the incidents complained of and the basis for their knowledge.

**ANSWER:**

9. With respect to Defendant Rinehart and Doherty, please provide their complete employment history, including but not limited to: date of hire; date of terminations or separations; positions and length of time same was held; promotions and dates of same; demotions and dates of same; dates of grievances filed; reasons for promotions; reasons for terminations; reasons for demotions; and reasons for any changes in positions.

**ANSWER:**

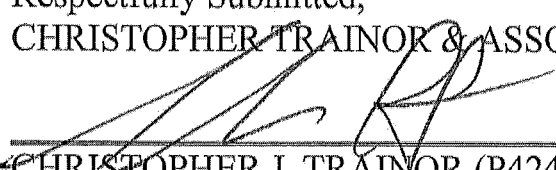
10. Other than the County of Wayne, has any other entity or individuals conducted any sort of investigation in the incidents complained of? If yes, please provide their complete names and contact information.

**ANSWER:**

**These Interrogatories are deemed continuing up to and through the time of trial.**

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Names, titles, and signatures of persons  
answering these Interrogatories.

Respectfully Submitted,  
CHRISTOPHER TRAINOR & ASSOCIATES

  
\_\_\_\_\_  
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Dated: May 24, 2024  
SCC

**PROOF OF SERVICE**

The undersigned certified that on the 24 day of May, 2024, a copy of the foregoing document was served upon the attorney (s) of record by e-mailing a copy of same to said attorney (s) at their stated business e-mail address. I declare under the penalty of perjury that the foregoing statement is true to the best of my information, knowledge and belief.

  
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*Courtney Frederick*